

Certification

I, Randy K. Rutherford, certify that I am an officer of Vonage Holdings Corp. (“Vonage”), and acting as an agent of Vonage, that I have personal knowledge that Vonage:

- (i) has completed the network preparations necessary to deploy the STIR/SHAKEN protocols on its network including, but not limited to, by participating in test beds and lab testing, or completing commensurate network adjustments to enable the authentication and validation of calls on its network consistent with the STIR/SHAKEN framework,
- (ii) has demonstrated its voluntary agreement to participate with other voice service providers in the STIR/SHAKEN framework by completing formal registration (including payment) and testing with the Policy Administrator,
- (iii) has completed the necessary network upgrades to at least one network element to enable the authentication and verification of caller ID information consistent with the STIR/SHAKEN standards, and
- (iv) reasonably foresees that it will have completed all necessary network upgrades to its network infrastructure to be able to authenticate and verify caller ID information for all SIP calls exchanged with STIR/SHAKEN-enabled partners by June 30, 2021

as required to seek an exemption from the Commission’s caller ID authentication rules for Vonage’s IP networks.¹ *See* 47 C.F.R. §§ 64.6301, 64.6306. [Vonage does not have any non-IP networks.]

Attached to this certification is an accompanying statement explaining how Vonage meets the above criteria for the IP networks exemption.

Vonage represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. Vonage also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

I certify, as agent of Vonage, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 1, 2020.



Randy K. Rutherford, Chief Legal Officer

¹ *See Wireline Competition Bureau Provides Directions and Filing Information Regarding Caller ID Authentication Exemption Certifications*, Public Notice, WC Docket No. 20-68, DA 20-1334 (rel. Nov. 9, 2020); *Call Authentication Trust Anchor*, Second Report and Order, WC Docket No. 17-97, FCC 20-136, ¶¶ 101–25 (rel. Oct. 1, 2020).

Accompanying Statement

As set forth in the above Certification, Vonage meets each of the prongs of the IP networks voluntary implementation exemption, as follows:

- (i) Vonage has completed all network preparations necessary to deploy the STIR/SHAKEN protocols on its network. Vonage has integrated a partner (Neustar) to provide authentication and verification services. Vonage has confirmed the successful implementation of these network preparations with successful STIR/SHAKEN call authentication testing with its two largest peering partners. Vonage is currently able to authenticate and validate calls on its network consistent with the STIR/SHAKEN framework.
- (ii) Vonage has demonstrated its voluntary agreement to participate with other voice service providers in the STIR/SHAKEN framework by completing formal registration (including payment) and testing with the Policy Administrator and has been issued a production certificate for Vonage SPID 197D.
- (iii) Vonage has completed the necessary upgrades to at least one network element to enable the authentication and verification of caller ID information. Vonage is currently able to authenticate and validate calls on its network consistent with the STIR/SHAKEN framework.
- (iv) Vonage reasonably foresees that it will have completed all necessary network upgrades to its network infrastructure to be able to authenticate and verify caller ID information for all SIP calls exchanged with STIR/SHAKEN-enabled partners by June 30, 2021. Vonage's network is already upgraded and able to authenticate and verify caller ID information for all SIP calls exchanged with STIR/SHAKEN-enabled partners, subject to continued testing to ensure full functionality and reliability.